

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Criminal No. 15-
	:	
v.	:	18 U.S.C. § 1343
	:	18 U.S.C. § 981(a)(1)(C)
MATTHEW S. NEUGEBOREN	:	28 U.S.C. § 2461
	:	26 U.S.C. 7206(1)
	:	

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE

1. From in or about January 2008 to in or about December 2012, in Ocean County, in the District of New Jersey, and elsewhere, the defendant,

MATTHEW S. NEUGEBOREN,

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud Company A of money and property by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme, did knowingly and intentionally cause to be transmitted in interstate commerce by means of a wire, radio, and television communication certain writings, signs, signals, pictures, and sounds, namely, on or about December 11, 2012, a wire in the amount of \$1,000,000 from a bank account in New Jersey to a bank account in Pennsylvania.

In violation of Title 18, United States Code, Section 1343.

COUNT TWO

1. The allegations in Count One of this Information are realleged and reincorporated herein.

2. On or about March 12, 2012 defendant MATTHEW S. NEUGEBOREN signed, filed, and caused to be filed with the Internal Revenue Service a 2011 United States Income Tax Return on his own behalf. That return stated that defendant MATTHEW S. NEUGEBOREN received \$261,143 in gross income for the calendar year 2011.

3. That tax return was signed by defendant MATTHEW S. NEUGEBOREN and contained a written declaration that it was made under the penalties of perjury.

4. That tax return was not true and correct as to every material matter in that the return did not include approximately \$630,000 in gross income MATTHEW S. NEUGEBOREN received in the calendar year 2011 from the wire fraud scheme described in Count One of the Information.

5. On or about March 12, 2012, in the District of New Jersey and elsewhere, the defendant,

MATTHEW S. NEUGEBOREN

did knowingly and willfully make and subscribe a 2011 United States Individual Income Tax Return, Form 1040, as described in paragraph 2, which he did not believe to be true and correct as to every material matter, as described in paragraph 4.

In violation of Title 26, United States Code, Section 7206(1).

FORFEITURE ALLEGATION

As the result of committing an offense in violation of Title 18, United States Code, Section 1343, as alleged in Count One of this Information, defendant MATTHEW S. NEUGEBOREN shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense.

1. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

Pursuant to Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461.



PAUL J. FISHMAN
United States Attorney